

EXHIBIT A-1

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

OPIOANS AGAINST CORPORATE BAILOUTS,	:	Case No. 2:19-CV-4466
<i>et al.</i> ,	:	
	:	
Plaintiffs,	:	Judge Edmund A. Sargus
	:	
	:	Magistrate Judge Kimberly A. Jolson
v.	:	
	:	
	:	
FRANK LAROSE, in his official capacity as	:	
Ohio Secretary of State, et al.,	:	
	:	
Defendants.	:	

DECLARATION OF LEWIS GRANOFSKY

Pursuant to 28 U.S.C. § 1746, I, Lewis Granofsky, hereby declare as follows:

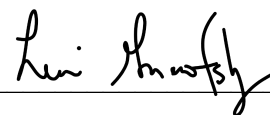
1. I am over 18 years of age and state based on personal knowledge and/or information received as follows.
2. I am employed as a Partner with Field Works, a professional political and ballot issue canvassing firm.
3. Field Works was engaged to conduct a public education campaign regarding Ohio House Bill 6 (“HB 6”), including at locations where a referendum petition on HB 6 (“Referendum”) was being circulated.
4. During the public education effort regarding HB 6, Field Works’ canvassers and field supervisors reported their activities to Field Works’ headquarters. These field reports included encounters with and observations of individuals circulating the HB 6 referendum petition.
5. The field reports were compiled and used to prepare a daily report on the HB 6 public education campaign.
6. The attached synopsis of incidents involving HB 6 referendum petition circulators is based on Field Works’ daily reports of its public education campaign regarding HB 6.
7. Based on my knowledge as a political canvassing and ballot issue professional, Advance Micro Targeting (“AMT”), which has been engaged to conduct the collection of signatures for the Referendum campaign, has limited experience qualifying initiatives to appear on statewide ballots, and a history in this respect which includes a high-profile failure to qualify a recall for the ballot in Nevada in

2018. A statewide referendum in Ohio is a massive undertaking, and a paid signature gathering program requires a firm with significant experience with statewide qualification.

8. Based on reports from other people and knowledge of their efforts in the state of Florida, AMT relocated professional field staff to Florida to work on a separate ballot measure effort and did not return them to Ohio immediately when the referendum petition was ready to be circulated. Based on my professional experience, this indicates that AMT likely did not have the necessary resources to meet all its commitments, including the Referendum campaign. Additionally, it took four days to gather the 1000 valid required to resubmit their language, something that should have been accomplished in one day. This indicates a lack of planning, professionalism, and resource allocation. Three extra days to collect signatures can be critical on a drive like this.
9. Based on reports and based on my own analysis of the Form 15 filings submitted, as well as tracking their recruitment efforts, AMT suffered from poor recruitment in the crucial initial stages of the campaign. Their advertising, outreach, and recruitment tactics were sub-par, and this undoubtedly contributed to their shortfall in signatures.
10. Based on reports and indirect observations, it appears that the Referendum campaign management was late to realize that AMT was not equipped to handle campaign signature collection needs and did not begin substantial petitioner recruitment efforts until the last three or four weeks of the Referendum campaign. That effort was disorganized and appeared uncoordinated with several firms competing for petitioners and subcontractors within their own camp. Based on my professional experience, it should have been clear at a much earlier point in time that AMT could not successfully qualify the Referendum for the ballot on their own, and their outreach effort to bring in other contractors and petitioners should have started sooner and with more coordination.
11. Based on reports, the petition circulators for the Referendum campaign have had to work under unfavorable conditions, including poor pay policies, disorganization, uncomfortable lodging, lack of rental vehicles, and generally poor management, leading to resignation of professional field staff.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 21st day of October 2019.



Incidents Reported by Field Works Educators

September 5, 2019

- Educators in Columbus reported an HB 6 petition circulator fail to witness a signature on the petition they were circulating.

September 10, 2019

- Educators in Toledo reported that an HB 6 circulator took the flyers from individuals who had spoken to the educators and threw them in a garbage can.
- Educators in Bowling Green were threatened by a circulator and their supervisor.
- Educators in Summit County reported that HB 6 circulators called the educators “scum” and cursed at them.

September 18, 2019

- An educator in Hamilton County reported that an HB 6 circulator physically accosted him, leading the educator to call the police.

September 19, 2019

- Educators in Cleveland reported that an HB 6 circulator was openly drinking alcohol while circulating the referendum petition and appeared to be intoxicated.

September 25, 2019

- Educators in London reported that an HB 6 circulator threatened them.
- Educators in Cleveland reported that an HB 6 circulator threatened to slap their phones out of their hands and was grabbing flyers from individuals who had spoken to the educators.

September 26, 2019

- Educators in Cleveland reported that they were verbally threatened by an HB 6 circulator.
- Educators on the campus of Columbus State Community College reported an HB 6 circulator telling potential signers that they could include a fake address with their signature on the petition.

September 30, 2019

- Educators in Akron reported that an HB 6 circulation manager threatened to physically assault them.
- Educators in Akron also reported that HB 6 circulators were knowingly soliciting signatures from individuals who were not registered to vote in Ohio.

October 2, 2019

- Educators at a shopping center in Franklin County reported that the manager of a local business asked a group of HB 6 circulators to leave the premises. The circulators refused

and threatened the manager and the educators. The manager called the police which prompted the HB 6 circulators to leave while driving at an unsafe speed.

October 3, 2019

- Educators in Columbus reported that an HB 6 circulator slapped the pen out of the hand of an individual who had initially said he would sign the petition but then changed his mind. The educators reported that the circulator physically and aggressively confronted the individual and backed off only after realizing that the educators were recording the confrontation.
- Educators in Westerville reported that an HB 6 circulator told them that the educators would have been shot if they were in Detroit.
- Educators in Cincinnati reported that an HB 6 petition circulator offered to pay an individual to sign the petition.

October 5, 2019

- Educators in Columbus reported that an HB 6 circulator assaulted an educator and immediately fled the scene on a bus. The educator reported this incident to the police.
- Educators in Columbus reported two HB 6 circulators encouraging individuals to sign the HB 6 petition using fake names, including one circulator who encouraged individuals to sign multiple times with fake names.

October 7, 2019

- An educator in Cincinnati reported that an HB 6 circulator appeared to make a phone call asking someone to bring him a gun to “deal with” the educators.

October 8, 2019

- Educators reported a violent incident with HB 6 circulators in a restaurant parking lot on US Highway 42 near Cincinnati. The circulators approached the car of the educators shouting obscenities at them. According to the educators’ report one of the circulators slapped the phone out of the hand of one of the educators who was attempting to record the encounter while another circulator repeatedly kicked the drivers’ side door of the vehicle the educators were travelling in, leaving dents. The educators also reported the circulators spit at them. The educators reported the incident to the police.
- Educators in Columbus reported being physically assaulted, threatened and pursued by a person associated with HB 6 circulators. The educators called the police and filed a report.
- Educators in Franklin County reported that three HB 6 circulators surrounding their vehicle and banged on the windows while threatening them. The educators called the police and the circulators fled before the police arrived.

October 9, 2019

- An educator in Akron reported that an HB 6 circulator drove dangerously, making multiple illegal turns while violating the speed limit.
- Educators in Cleveland reported that an HB 6 circulator admitted to them that she was permitting individuals to sign the referendum petition using false names.
- Educators in Columbus reported that an HB 6 circulator drove recklessly through a parking lot, nearly striking a pedestrian.

October 11, 2019

- Educators in Gahanna and Columbus reported being threatened by HB 6 circulators.

October 15, 2019

- Educators in Youngstown reported that an HB 6 circulator verbally threatened them with firearms.

October 16, 2019

- Educators reported being threatened by HB 6 circulators in Columbus.

October 19, 2019

- Educators reported that HB 6 petitions were being circulated which contained only the summary.